

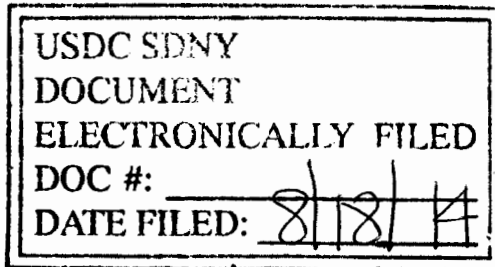
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE FACEBOOK, INC. IPO SECURITIES  
AND DERIVATIVE LITIGATION

MDL No. 12-2389 (RWS)

STIPULATION AND  
[PROPOSED] MODIFIED  
PRETRIAL SCHEDULING ORDER

This document relates to the  
Consolidated Securities Action:



No. 12-cv-4081	No. 12-cv-4763
No. 12-cv-4099	No. 12-cv-4777
No. 12-cv-4131	No. 12-cv-5511
No. 12-cv-4150	No. 12-cv-7542
No. 12-cv-4157	No. 12-cv-7543
No. 12-cv-4184	No. 12-cv-7544
No. 12-cv-4194	No. 12-cv-7545
No. 12-cv-4215	No. 12-cv-7546
No. 12-cv-4252	No. 12-cv-7547
No. 12-cv-4291	No. 12-cv-7548
No. 12-cv-4312	No. 12-cv-7550
No. 12-cv-4332	No. 12-cv-7551
No. 12-cv-4360	No. 12-cv-7552
No. 12-cv-4362	No. 12-cv-7586
No. 12-cv-4551	No. 12-cv-7587
No. 12-cv-4648	

WHEREAS, the Court entered a Scheduling Order on February 5, 2014 (the "Original Pretrial Scheduling Order" (ECF No. 209));

WHEREAS, the Original Pretrial Scheduling Order contemplated that document discovery would commence on February 7, 2014, and that the Lead Plaintiffs would file their class certification motion by August 22, 2014;

WHEREAS, production of documents relevant to class certification remains ongoing and is expected to be completed by September 30, 2014;

WHEREAS, the Parties have met-and-conferred concerning an adjustment to the case schedule in light of the status of document production;

WHEREAS, the Parties agree that the deadline for the Lead Plaintiffs to file their class certification motion should be extended from August 22, 2014 to November 14, 2014, and the remaining deadlines in the Original Pretrial Scheduling Order should be adjusted accordingly; and

WHEREAS, pursuant to Section VII of the Original Pretrial Scheduling Order, which permits the Parties to seek modification of the pretrial schedule, and in accordance with Fed. R. Civ. P. 26(f)(3), the Parties jointly propose the following Modified Pretrial Scheduling Order:


Event	Deadline
Commencement of Discovery	February 7, 2014
Deadline for Defendants to Answer the Complaint	April 25, 2014
Plaintiffs' Motion for Class Certification	November 14, 2014
Deadline to Join Additional Parties and Amend Pleadings	December 31, 2014
Defendants' Opposition to Class Certification Motion	February 18, 2015
Plaintiffs' Reply in Support of Class Certification	March 27, 2015
Close of Fact Discovery	May 8, 2015
Plaintiffs' Expert Reports on Issues for Which Plaintiffs Have Burden of Proof	May 31, 2015
Defendants' Expert Reports in Response to Plaintiffs' Expert Reports and on Issues for Which Defendants Have Burden of Proof	July 14, 2015
Plaintiffs' Reply Expert Reports and Expert Reports in Opposition to Defendants' Expert Reports	August 21, 2015
Defendants' Rebuttal Expert Reports	September 30, 2015
Expert Depositions Complete; Close of Expert Discovery	November 20, 2015
Deadline to File Dispositive Motions	January 22, 2016
Opposition to Dispositive Motions	March 11, 2016
Replies in Support of Dispositive Motions	April 22, 2016

Each Party reserves its right to seek further modifications of case deadlines. The Lead Plaintiffs expressly reserve the right to seek further modifications to the case deadlines if the production of documents relevant to class certification is not completed by September 30, 2014.

Dated: August 12, 2014  
New York, New York

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

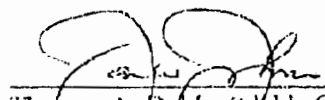
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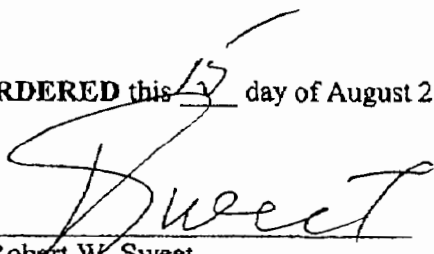
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SO ORDERED this 15 day of August 2014:

  
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Hon. Robert W. Sweet  
United States District Judge